

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG, INC.

v.

AROMATIQUE, INC.; ET AL.

NO. 2:10-CV-570-TJW

JURY

PLAINTIFF'S ANSWER TO COUNTERCLAIMS OF
ROLEX WATCH USA, INC.

Plaintiff Geotag, Inc. ("Geotag") answers the counterclaims of Defendant Rolex Watch USA, Inc. ("Rolex") by corresponding paragraph number as follows:

1. Admitted that Rolex purports to assert counterclaims. Denied as to merits of counterclaims.
- 2-3 Admitted.
4. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
5. Admitted as to venue over counterclaims. Denied as to merits of counterclaims.
6. Geotag incorporates its responses to paragraphs 1-5 above.
7. Admitted there is a "case or controversy" for purposes of subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
8. Denied that Rolex is entitled to any declaratory relief. Denied as to merits of counterclaims.
9. Geotag incorporates its responses to paragraphs 1-5 above.
10. Admitted there is a "case or controversy" for purposes of subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.

11. Denied that Rolex is entitled to any declaratory relief. Denied as to merits of counterclaims. Denied as to all allegations alleging invalidity of the patent-in-suit.

12. Geotag incorporates its responses to paragraphs 1-5 above.

13. Admitted there is a “case or controversy” for purposes of subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.

14. Denied that Rolex is entitled to any declaratory relief. Denied as to merits of counterclaims. Denied as to all allegations alleging unenforceability of the patent-in-suit.

15. To the extent necessary, Geotag denies that Defendant is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, Geotag generally denies any allegation in the counterclaims not specifically admitted above, and Geotag re-alleges infringement, validity, enforceability and damages, and denies any allegations in the counterclaims adverse to same.

PRAYER FOR RELIEF

WHEREFORE, Geotag respectfully requests that this Court enter judgment denying and dismissing Defendant’s counterclaims, and that the Court enter judgment in favor of Geotag as requested in Geotag’s complaint, as amended or supplemented.

March 7, 2011

Respectfully submitted,

GEOTAG, INC.

By: /s/ John J. Edmonds

John J. Edmonds – Lead Counsel

Texas Bar No. 789758

Michael J. Collins

Texas Bar No. 4614510

Stephen F. Schlather

Texas Bar No. 24007993

COLLINS, EDMONDS & POGORZELSKI, PLLC

1616 S. Voss Road, Suite 125

Houston, Texas 77057

Telephone: (281) 501-3425

Facsimile: (832) 415-2535
jedmonds@cepiplaw.com
mcollins@cepiplaw.com
sschlather@cepiplaw.com

Charles van Cleef
COOPER & VAN CLEEF, PLLC
500 N Second St.
Longview, TX 75601
(903) 248-8244
(903) 248-8249 fax
charles@coopervancleef.com

ATTORNEYS FOR PLAINTIFF
GEOTAG, INC.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

March 7, 2011

/s/ John J. Edmonds
John J. Edmonds